

*Attorneys for Defendant The Guida-Seibert Dairy Company*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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TIFFANEE GOULD, individually and on	:	Case No. 1:22-cv-01861-NLH-AMD
behalf of her minor son, A.J., <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	<b>NOTICE OF MOTION FOR</b>
	:	<b>ADMISSION <i>PRO HAC VICE</i> OF</b>
v.	:	<b><u>BENJAMIN P. ABEL</u></b>
	:	
THE GUIDA-SEIBERT DAIRY COMPANY,	:	
<i>et al.</i> ,	:	Motion Date: July 5, 2022
	:	
Defendants.	:	
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**PLEASE TAKE NOTICE** that upon the annexed Certification of local counsel Philip A. Goldstein, the Certification of Benjamin P. Abel, and upon all prior pleadings and proceedings in this action, Defendant The Guida-Seibert Dairy Company (“Defendant”) shall move this Court before the Honorable Ann Marie Donio, U.S.M.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 3B, Camden, New Jersey 08101, on July 5, 2022, for an Order pursuant to Local Civil Rule 101.1(c) admitting Benjamin P. Abel *pro hac vice*, to participate before this Court in all proceedings in this action and in any related mediation or arbitration.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendant shall rely upon the Certification of Philip A. Goldstein and the Certification of Benjamin P. Abel submitted herewith. A proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that counsel for Plaintiffs do not consent to this motion. Movant respectfully requests oral argument if an opposition to this motion is filed.

Dated: New York, New York  
June 10, 2022

Respectfully submitted,

**MCGUIREWOODS LLP**

By: /s/ Philip A. Goldstein  
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